

REMARKS

Reconsideration and allowance of the subject application in view of the foregoing amendments and the following remarks is respectfully requested.

By this Amendment, claims 14, 27, and 32 are amended. In addition, new claim 36 is added to secure an appropriate scope of protection to which Applicants are believed entitled. Accordingly, claims 1-36 are pending in this application.

Claim Rejections Under 35 USC §103(a)

Claims 1, 8-10, 22-24, 30, and 33 stand rejected under 35 U.S.C. §103(a) over Yu et al. (US 6,684,087), Nagata et al. (US 6,701,017), and Sano et al. (US 2002/0196970).

Claims 2-5, 11-13, 15-18, 21, 25-26, 28-29, 31, 34, and 35 stand rejected under 35 USC 103(a) as obvious over Yu, Nagata, Sano, and Lim (US 7,233,807).

Claims 14, 27, and 32 stand rejected as obvious over Yu in view of Nagata.

Claims 19 and 20 stand rejected under 35 USC 103(a) as obvious over Yu in view of Nagata, and further in view of Minami (US 2003/0117407).

Claim 21 stands rejected as obvious over Yu, Nagata, Minami, and Lim.

Amended and unamended claims are believed patentable over the applied references for the following reasons.

Regarding independent claim 1, the Patent and Trademark Office (PTO) admits that Yu fails to teach a format converting unit within the mobile device, and relies on Sano to remedy the respective deficiencies of Yu, positing that it would have been obvious to one of ordinary skill in the art to modify Yu with Sano because both Yu and Sano relate to images and the addition of the format converting unit could reduce file size of the image, allowing less memory to be used to store the image. Applicants respectfully disagree.

As acknowledged by the PTO, claim 1 that recites wherein the format converting unit converts the picture data from the wireless transmitting/receiving device into a plurality of unit blocks, Yu appears to only disclose a formatting unit in a remote server that transmits single picture frames to the mobile device. Sano only appears to disclose an image conversion apparatus that includes a file size determiner, an image divider, and an image compressor processor. Nowhere does Sano disclose how the device of Sano may be incorporated. Indeed, nowhere does Sano even mention a mobile device.

Therefore, Applicants respectfully submit that any allowable combination of Yu, Nagata and Sano would integrate the formatter of Sano in the server of Yu, and not in the mobile device, as recited in claim 1. Applicants submit that the rejection is in error because there is no suggestion or motivation in the asserted combination of references that would have led one to select the references and combine them in a way that would produce the invention defined by any of claims. Applicants respectfully submit therefore that independent claim 1, and claims 2-5 and 8-13 that depend from claim 1 are allowable over all combinations of Yu, Nagata, and Sano.

Independent claims 14, 27, and 32, rejected as obvious over Yu in view of Nagata, recite different embodiments of apparatus and methods of converting and displaying picture data on a mobile device. More specifically, unlike claim 1 that claims an apparatus configured to divide the high resolution picture data on the mobile device, claims 14, 27, and 32 recite methods and systems wherein the dividing and indexing is performed on a format converting server that transmits the data to the mobile device.

Applicants respectfully submit that the claimed system and method is configured to generate and store a file, converted into a picture file format that includes the picture data and indexes of each unit block, and is further configured to store the converted file in a converted file database. In other words, the methods and system recited in claims 14, 27, and 32 divide and transmit all unit blocks in one converted file and are distinguished from Yu in that Yu appears to only disclose transmitting images, one image at a time, to the mobile device.

Furthermore, the PTO admits that Yu fails to disclose the claimed scrolling feature, and relies on Nagata to cure this deficiency. Applicants submit that the user interface of Yu is distinguished from that of Nagata and that the two modes of operation are incompatible. Yu

appears to disclose an imaging system wherein the initial view is not a high resolution view, but rather a reduced image that includes subareas of the entire picture (see Abstract). When the reduced version is displayed on the mobile device and a user decides to view a specific area that falls within one of the subareas, a corresponding key is activated that transmits a new request to the server for the detailed view. Accordingly, every time a user of Yu's system wishes to view a new view, even an adjacent image, a subarea that includes an entire screen area must be transmitted and displayed. Although Nagata appears to disclose receiving and expanding only a changed picture portion of the high resolution picture, wherein scrolling may be used to see the whole high resolution picture, this feature would be incompatible with Yu for it would then request the window to display an area beyond the selected subarea which is not the intent of Yu, which has downloaded only a high resolution view of the selected subarea.

Notwithstanding the distinguishing features presented above, independent claims 14, 27, and 32 are amended to further define "wherein a size of each unit block of picture data is less than a size of a display size of the mobile communications terminal." Applicants submit that this feature minimizes the number of unit blocks required to be processed when scrolling. New claim 36 depends from claim 1 and likewise recites this feature.

Based upon the above, amended claims 14, 27, and 32 are allowable over Yu in view of Nagata for the failure of the applied art to not only disclose, teach or suggest all of Applicants' recited claim features, but in addition fails to present any apparent reason to combine references or modify prior art to create the Applicants' allegedly obvious claim elements.

Claims 2-5, 11-13, 15-21, 25-26, 28-29, 31, and 34-45 that depend variously from claims 1, 14, 27, and 32 are likewise allowable over the applied references for the failure of the applied references to remedy the deficiencies of Yu, Sano, and Nagata, as applied to independent claim 1 or the deficiencies of Yu and Nagata as applied to independent claims 14, 27, and 32. Accordingly, withdrawal of these rejections are respectfully requested.

Conclusion

All objections and rejections having been addressed, it is respectfully submitted that the present application should be in condition for allowance and a Notice to that effect is earnestly solicited.

The Examiner is invited to telephone the undersigned, Applicants' attorney of record, to facilitate advancement of the present application.

To the extent necessary, a petition for an extension of time under 37 C.F.R. 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account 07-1337 and please credit any excess fees to such deposit account.

Respectfully submitted,

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